

**IN THE UNITED STATES COURT OF APPEALS  
FOR  
THE EIGHTH CIRCUIT**

**JANICE HARGROVE WARREN**

**APPELLEE**

**v.**

**Appeal No. 22-2067**

**Cross-Appeal No. 22-2169**

**MIKE KEMP, et al.**

**APPELLANTS**

**MOTION FOR AN EXTENSION TO FILE  
PETITION FOR REHEARING EN BANC**

Comes now the Appellee, Janice Warren, through her counsel, Sarah Howard Jenkins, PLLC, and Terrance Cain, requesting this Honorable Court for an extension of nine (9) days to file her Petition for Rehearing *En Banc* and says:

1. This Honorable Court issued its opinion on August 22, 2023;
2. Appellee's petition is due September 5, 2023, the time for filing her petition has not expired;
3. Because of time demands and scheduling, Appellee's second chair counsel for this appeal needed to review all previous briefings in this case and requests additional time to prepare a thorough petition of prevailing contrary

authority on the principles, standards, and conclusions in the August 22, 2023, opinion.

WHEREFORE, for the reasons stated above, good cause shown, Appellee requests an additional nine (9) days, up to and including September 14, 2023, to file her Petition for Rehearing *En Banc*.

Respectfully Submitted this 30th day of August, 2023,

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By: /s/ Sarah Howard Jenkins  
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Attorneys for Appellee/ Cross-Appellant

### **CERTIFICATE OF COMPLIANCE**

1. This motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because it contains 210 words, excluding those parts of the document exempted by Fed. R. App. P. 32(f).

2. This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word in Times New Roman 14-point font.

Dated: August 30, 2023

By: /s/ Sarah Howard Jenkins  
Attorney for Appellee/ Cross-Appellant

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2023, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

By: /s/ Sarah Howard Jenkins  
Sarah Howard Jenkins  
Attorney for Appellee/ Cross-Appellant